

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Norfolk Division**

**STONEY GLEN, L.L.C.,**

**JOHN P. WRIGHT,**

**and**

**ALLEN O. KEENE**

**Plaintiffs and Counter-Claim Defendants,**

**v.**

**Civil Action No.: 2:13cv00008**

**SOUTHERN BANK AND TRUST COMPANY,**

**Defendant and Counter-Claim Plaintiff.**

**SOUTHERN BANK AND TRUST COMPANY’S MOTION TO COMPEL RESPONSES  
FROM PLAINTIFF JOHN P. WRIGHT**

Southern Bank & Trust Company (“Southern Bank”), by counsel, files this Motion to Compel Plaintiff John P. Wright to produce material that he has withheld from production. Pursuant to Local Rule 37(e), Southern Bank certifies that it has in good faith conferred with Plaintiffs’ counsel in an effort to obtain the discovery without court action. For the reasons set forth in the accompanying Memorandum in Support of this Motion to Compel, Southern Bank respectfully requests that the Court overrule John P. Wright’s objections to Southern Bank’s discovery requests, and order John P. Wright to produce the requested documents.

Wherefore, Southern Bank respectfully requests that this Court: (1) overrule John P. Wright’s objections to Southern Bank’s Requests for Production as requested in the

accompanying memorandum, and (2) order John P. Wright to produce all documents previously withheld that are responsive to the requests set forth in the attached memorandum.

**SOUTHERN BANK AND TRUST  
COMPANY**

By: /s/ David M. Gettings  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 16th day of September, 2013, I electronically filed the foregoing Motion to Compel with the Clerk of the Court using the CM/ECF System which will deliver a true and correct copy of the foregoing document via CM/ECF to the following:

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